

PACHULSKI STANG ZIEHL & JONES LLP

Robert J. Feinstein (RF2836)

Bradford J. Sandler (BS1367, petition for attorney admission to W.D.N.Y. pending)

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[Proposed] Attorneys for

The Official Committee of Unsecured Creditors

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK**

In re:

NATIONAL AIR CARGO, INC.,

Debtor.

Chapter 11

Case No. 14-12414-MJK

**NOTICE OF APPLICATION FOR ENTRY FOR AN ORDER AUTHORIZING AND
APPROVING THE EMPLOYMENT OF PACHULSKI STANG ZIEHL & JONES LLP
AS COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF
NATIONAL AIR CARGO, INC., EFFECTIVE AS OF NOVEMBER 14, 2014**

To: (a) the Office of the United States Trustee for the Western District of New York;
(b) counsel to the Debtor; (c) parties included on the Debtor's List of Creditors
Holding Twenty (20) Largest Unsecured Claims; and (d) those parties who have
requested notice pursuant to Bankruptcy Rule 2002.

PLEASE TAKE NOTICE that on November 24, 2014, the Official Committee
of Unsecured Creditors (the "Committee") appointed in the above-captioned chapter 11 cases, by
and through its undersigned counsel, filed the *Application for Entry of an Order Authorizing and
Approving the Employment of Pachulski Stang Ziehl & Jones LLP as Counsel to the Official
Committee of Unsecured Creditors of National Air Cargo, Inc., Effective as of November 14,
2014* (the "Application") with the (the "Bankruptcy Court"). A copy of the Application is
attached hereto.

PLEASE TAKE FURTHER NOTICE that, objections, if any, to the relief requested in the Application (i) must be in writing; (ii) conform to the Fed. R. Bankr. P. and Local Rules of the Court; and (iii) are due as soon as practicable in accordance with Local Rule 9013-1(B).

PLEASE TAKE FURTHER NOTICE that at the same time, you must also serve a copy of the response or objection upon: (i) (proposed) counsel to the Official Committee of Unsecured Creditors, (a) Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, Wilmington, DE 19801 (Courier 19801), Attn: Bradford J. Sandler (bsandler@pszjlaw.com) and (b) Pachulski Stang Ziehl & Jones LLP, 780 Third Avenue, 34th Floor, New York, New York 10017, Attn: Robert J. Feinstein (rfeinstein@pszjlaw.com); (ii) counsel for the Debtor, Harter Secrest & Emery LLP, 12 Fountain Plaza, Suite 400, Buffalo, NY 14202-2293, Attn: Raymond L. Fink, Esq. (rfink@hselaw.com); and (iii) the Office of the United States Trustee for the Western District of New York, Olympic Towers, 300 Pearl Street, Suite 401, Buffalo, NY 14202, Attn: Joseph W. Allen, Esq.

PLEASE TAKE FURTHER NOTICE that, in support of the Application, the undersigned shall rely on the accompanying Application and the Declaration of Bradford J. Sandler in support thereof, which collectively set forth the relevant factual and legal basis upon which the relief requested should be granted. A proposed Order granting the relief requested in the Application is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that the undersigned waives oral argument unless objections to the Application are timely filed.

Dated: November 24, 2014

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Robert J. Feinstein

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[Proposed] Attorneys for
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